

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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IN RE: Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to

**WORD COUNT COMPLIANCE**

*All Cases*

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I certify that the **Memorandum In Support of Defendants' Unopposed Motion for the Issuance of a Letter of Request for International Judicial Assistance to the Appropriate Judicial Authorities in Australia** complies with the length limitations set forth in LR 7.1(f), as well as the type size requirements set forth in LR 7.1(h).

I further certify that in preparation of this memorandum, I used Microsoft® Office Word 2010, and the word processing program has an appropriate functioning word count tool applied specifically to include all text, including headings, footnotes, and quotations.

I certify that the above-referenced memorandum contains 1,215 words.

Dated: August 1, 2016

Respectfully submitted,

*s/Bridget M. Ahmann*

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